

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

KAREN SUMMERSET, individually and on behalf of all others similarly situated,

Plaintiff,

v.

LIBERTY MUTUAL INSURANCE COMPANY,

Defendant.

Case No. 1:25-cv-11121-PBS

**CLASS ACTION**

**JURY TRIAL DEMANDED**

**PLAINTIFF'S UNOPPOSED MOTION TO AMEND**

Plaintiff Karen Summerset, by and through undersigned counsel, respectfully move this Court pursuant to Federal Rule of Civil Procedure 15(a)(2) for leave to file the First Amended Class Action Complaint attached hereto as Exhibit 1. In support of this motion, Plaintiff state as follows:

Plaintiff seeks leave to file the Complaint to add claims of Sara Taylor arising from Defendant Liberty Mutual Insurance Company's alleged violations of the Telephone Consumer Protection Act ("TCPA"), 47 U.S.C. § 227, et seq. Defendant does not oppose this motion.

Federal Rule of Civil Procedure 15(a)(2) provides that courts "should freely give leave [to amend] when justice so requires." *See Foman v. Davis*, 371 U.S. 178, 182 (1962). Leave to amend should be granted unless there is evidence of undue delay, bad faith, dilatory motive, repeated failure to cure deficiencies, undue prejudice, or futility of amendment. *ACA Fin. Guar. Corp. v. Advest, Inc.*, 512 F.3d 46, 55 (1st Cir. 2008). None of these factors are present here. The proposed amendment is timely, made in good faith, and will not prejudice Defendant, particularly as Defendant has consented to the filing of the amended complaint.

For the foregoing reasons, Plaintiffs respectfully request that the Court grant this Unopposed Motion for Leave to File the First Amended Class Action Complaint and accept the attached proposed complaint.

Dated: November 11, 2025

*/s/ Anthony I. Paronich*  
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